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February 21, 2013

Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

By Hand Delivery

Re: In the Matter of Integrated Resource Planning for the Provision of Standard Offer
Service by Delmarva Power & Light Company under 26 Del. C. §1007(c) & (d)
PSC Docket No. 12-544

To Whom It May Concern:

On behalf of the Department of Natural Resources and Environmental Control, please find enclosed for filing the original and ten copies of the Department's petition to intervene in the above-referenced matter. Thank you for your assistance in this matter.

Sincerely,

Ralph K. Durstein, III
Ralph K. Durstein, III
Deputy Attorney General

Enclosure

cc: Service List
Collin O'Mara, Secretary
Thomas Noyes, DNREC
Environmental Unit

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF INTEGRATED RESOURCE)	
PLANNING FOR THE PROVISION OF)	
STANDARD OFFER SERVICE BY DELMARVA)	PSC DOCKET No. 12-544
POWER & LIGHT COMPANY UNDER)	
26 <i>DEL. C.</i> §1007(C) & (D))	
(OPENED DECEMBER 18, 2012))	

**PETITION OF THE DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL FOR LEAVE TO INTERVENE**

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission (“Commission”), the State of Delaware Department of Natural Resources and Environmental Control (“DNREC”) hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, DNREC states the following:

1. Docket No. 12-544, filed by Delmarva Power, is an application for review of its Integrated Resource Plan (“IRP”). The IRP includes projections of environmental costs and benefits, which are of direct concern to DNREC. Intervener status would empower DNREC to fully engage as a party in this matter. DNREC intervened in a similar docket, PSC Docket No. 10-2, Delmarva Power’s 2010 IRP.

2. DNREC is an agency of the State of Delaware, created pursuant to 29 *Del. C.* § 8001, *et seq.* DNREC’s mission “is to ensure the wise management, conservation, and enhancement of the State’s natural resources, protect public health and the environment, provide quality outdoor recreation, improve the quality of life and educate the public on historic, cultural,

and natural resource use, requirements and issues.”

3. DNREC’s contact information, pursuant to Rule 21(i) of the Commission’s Rules of Practice and Procedure, is as follows:

Thomas G. Noyes
Division of Energy & Climate
Delaware Department of Natural Resources and Environmental Control
1203 College Park Drive, Suite 101
Dover, DE, 19904
Phone: (302) 735-3356
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Ralph K. Durstein III
Deputy Attorney General
Carvel State Office Building
820 N. French St.
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Tel: (302) 577-8510
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E-mail: ralph.durstein@state.de.us

4. DNREC’s interest in the outcome of this proceeding is ensuring that Delmarva Power’s IRP appropriately values the environment impacts of the energy supply options reflected in the IRP.

5. The Electric Utility Supply Act of 2006 (26 *Del. C.* §1007) provides that Delmarva Power “may consider the economic and environmental value” of its resource mix, including “[r]esources that provide short- or long-term environmental benefits to the citizens of this State (such as renewable resources like wind and solar power)” in developing this IRP.

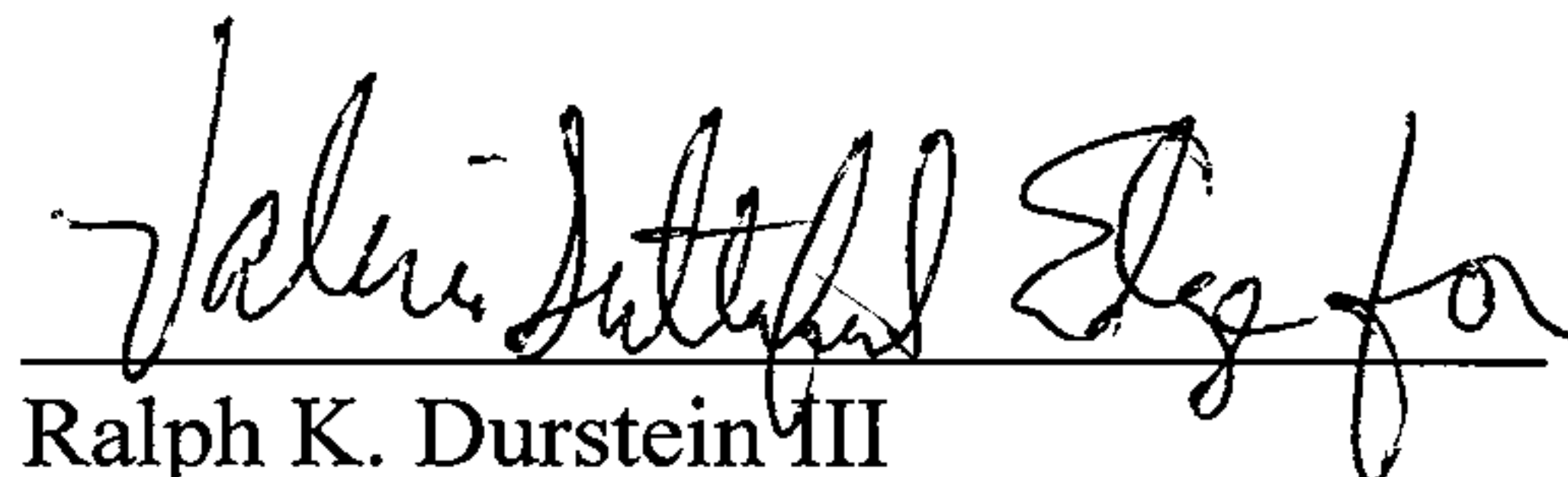
6. The Public Service Commission regulations governing the development of the IRP requires that Delmarva Power “seek input into externalities, including but not limited to, health effects” from DNREC. (26 DE Reg. 953 (01/01/10)). Delmarva consulted with DNREC on externalities in developing the IRP presented in this docket.

7. DNREC's interest will not be adequately represented by any of the other parties to this proceeding. The DNREC Division of Energy & Climate has statutory responsibility for the management and development of energy policy in Delaware, including renewable energy markets and energy efficiency programs. In that respect, no other participant in this proceeding has the same obligation to promote renewable energy and energy efficiency in Delaware.

8. DNREC's participation in the proceeding would be in the public interest. The public relies upon DNREC to provide guidance and expertise in developing and managing renewable energy markets in Delaware. As a public agency, DNREC has no private interest in the outcome of the proceeding.

9. For the foregoing reasons, DNREC respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ralph K. Durstein III", is written over a horizontal line.

Ralph K. Durstein III
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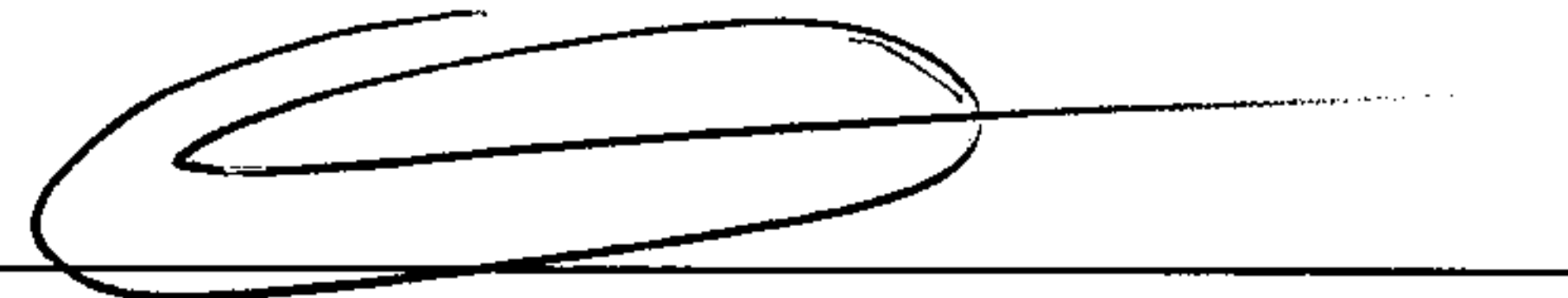
Attorney for the Department of Natural
Resources and Environmental Control

Dated: February 21, 2013

CERTIFICATE OF SERVICE

I, Valerie Satterfield Edge, do hereby certify that true and correct copies of the Petition for Leave to Intervene of the Department of Natural Resources and Environmental Control were served to the service list attached by electronic mail on February 21, 2013.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'V' followed by a horizontal line.

Valerie Satterfield Edge
Deputy Attorney General

SERVICE LIST
DP&L'S 2012 INTEGRATED RESOURCE PLAN
PSC Docket No. 12-544
As of 01/09/13

<u>Hearing Examiner</u>	<u>PSC Staff</u>
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<p>James McC. Geddes, Esquire Ashby & Geddes 500 Delaware Avenue, Suite 800 P.O. Box 1150 Wilmington, DE 19899 Tel: 302-654-1888 Fax: 302-654-2067 E-mail: jgeddes@ashby-geddes.com jamesgeddes@mac.com</p> <p>Julie (Jo) M. Donoghue, Esquire Deputy Attorney General Delaware Department of Justice 820 North French Street, 6th Floor Wilmington, DE 19801 Tel: 302-577-8348 (Wilmington) Tel: 302-736-7558(Dover) Fax: 302-739-4849 Email: jo.donoghue@state.de.us</p>	

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<p>Andrea Maucher, Public Utilities Analyst Division of the Public Advocate John G. Townsend Building 401 Federal Street, Suite 3 Dover, Delaware 19901 Tel: 302-857-4620 Fax: 302-739-3811 Email: andrea.maucher@state.de.us</p>	
<u>Delmarva Power & Light Company</u>	<u>Delmarva Power & Light Company</u>
<p>Todd L. Goodman, Esquire Associate General Counsel [Claudine B. Vazquez-Legal Assistant] Pepco Holdings Inc., Legal Services P.O. Box 6066 Mailstop 92DC42 Newark, DE 19714-6066</p> <p><u>Overnight Mail:</u> 500 North Wakefield Drive Mailstop 92DC42 Newark, DE 19702</p> <p>Goodman Phone: 302-429-3786 Vazquez Phone: 302-429-3311 Fax: 302-429-3801 Email: todd.goodman@pepcoholdings.com; claudinevazquez@pepcoholdings.com</p>	<p>Jack Barrar PHI-Delmarva Power – Edison Place 701 Ninth Street, NW, 9th Floor Room 9200 Washington, D.C. 20068 Tel: 202-872-3425 Email: jebarrar@pepco.com <u>Email distribution only:</u> bill.mitchell@pepcoholdings.com len.beck@pepcoholdings.com mark.finfrock@pepcoholdings.com gary.stockbridge@pepcoholdings.com wrs wink@pepco.com rjreuter@pepco.com lisa.pfeifer@pepcoholdings.com wlmcnealy@pepco.com; spreavey@pepcoholdings.com slsunderhauf@pepco.com diana.deangelis@pepcoholdings.com mscheller@icfi.com bob.collacchi@pepcoholdings.com</p>

<u>INTERVENORS</u>	
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